



ADRP Draft Conference Summary

Review No. 171 – Quenched and Tempered Steel Plate exported from Finland, Japan and Sweden

Panel Member	Leora Blumberg
Review type	Review of Minister's decision
Date	25 July 2025
Participants	Anti-Dumping Commission (ADC): <ul style="list-style-type: none">• [REDACTED] Principal Legal Counsel• [REDACTED] Director, Investigations• [REDACTED] Assistant Director, Investigations
Time opened	9:30 AEST
Time closed	11:00 AEST

Purpose

The purpose of this conference was to obtain further information in relation to the review before the Anti-Dumping Review Panel (Review Panel) in relation to quenched and tempered steel plate exported from Finland, Japan and Sweden.

The conference was held pursuant to section 269ZZHA of the *Customs Act 1901* (the Act).

In the course of the conference, I was able to ask parties to clarify any argument, claim or specific detail contained in their application or submission. The conference was not a formal hearing of the review, and was not an opportunity for parties to argue their case before me.

In accordance with section 269ZZHA(2), in making a recommendation under subsection 269ZZK(1), I may have regard to:

- (a) further information provided at this conference to the extent that it relates to “relevant information” within the meaning of section 269ZZK(6) of the Act;
- (b) any conclusions reached at this conference based on “that relevant information”.

At the time of the conference, I advised the participants

- That the conference was being recorded and transcribed by Loghic Events, and that the recording would capture everything said during the conference.
- That the conference was being recorded for the Review Panel to have regard to when preparing a conference summary. The conference summary would then be



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published on the Review Panel's website.

- Any confidential information discussed during the conference would be redacted from the conference summary prior to publication.

Prior to the conference, participants were provided with a copy of the Review Panel's Privacy Statement. The Privacy Statement outlines who the conference recording and transcript may be disclosed to. The Privacy Statement is available on the Review Panel's website [here](#). The participants indicated that they understood the Privacy Statement and consented to:

- The recording of the conference; and
- The recording being dealt with as set out in the Privacy Statement.

Further Information Sought and Provided¹

The specific information that the Review Panel sought and was provided in this conference was as follows:

1. Please can the ADC clarify the percentage of "invalidated" SSAB AU wear plate purchase orders that were excluded from the comparison due to material difference in price to the sales invoice, as referenced on page 13 of the Preliminary Reinvestigation Report.

See response to Request 1 of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

2. Please can the ADC clarify the following statement on page 14 of the Preliminary Reinvestigation Report and indicate how this methodology differed from that of REP 638, as reflected in Confidential Attachment 12 thereto:

¹ It should be noted that details of the further information sought was provided to the ADC prior to the conference and is set out in regular black ink, numbered in accordance with the further information request provided to the ADC before the conference. The ADC's responses are set out below each such request in *purple ink italics*. In most instances, reference is made to the ADC's written responses provided after the conference and attached as Addendum 1 to this conference summary. Where further clarification was requested during the conference that was not part of the further information requested and provided to the ADC prior to the conference, this is indicated in **bold black ink**. The ADC's responses to these further clarification requests have been incorporated into the ADC's written responses and in this regard, reference is so made to Addendum 1.



Noting the uniformity of prices across the 4 SSAB AU MCCs, the commission considered it reasonable to compare MCCs at a **higher point of comparison** (using MCC categories of grade, Brinell hardness and thickness) rather than the extended MCC which included width and length.” [emphasis added]

See response to Request 2 of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

3. Regarding the ADC’s statement on page 14 of the Preliminary Reinvestigation Report noting that the price to the distributor is at a different level of trade to the SSAB AU sales but that the ADC considers it is nonetheless reasonable for the purposes of price comparability, could the ADC clarify if this means that the undercutting percentage would likely be higher if adjustments were made for level of trade.

See response to Request 3 of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

4. With reference to the ADC’s reinvestigated determination that, “SSAB AU undercut Bisalloy by between 7% and 9%” (on page 14 of the Preliminary Reinvestigation Report) which was calculated for wear plate sales to the two largest common customers:

- a. Please could the ADC confirm that the percentage undercutting, as reflected in the “Price Undercutting by PO” sheet of Confidential Attachment 1 is calculated with reference to the total value of the sales for the period divided by the total volume of sales for the period, for SSAB AU and Bisalloy, respectively.

See response to Request 4.a. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

- b. Please could the ADC indicate if in the reinvestigation and using the purchase order date as the appropriate date of price comparison:
 - i. an aggregate quarterly price comparison was conducted between Bisalloy and SSAB AU’s Swedish-sourced wear grades, similar to that referenced on page 73 of REP 638, as supported by Confidential Attachment 12.



See response to Request 4.b.i. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

- ii. a quarterly price comparison was conducted between Bisalloy and SSAB AU for the 10 common MCC's of wear grades, similar to that referenced on page 71 of REP 638, as supported by Confidential Attachment 12.

See response to Request 4.b.ii. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

If the ADC conducted the above-mentioned price comparisons, please provide details of these calculations and percentages, similar to the "Wear Grade Undercutting" and "Wear – Common MCC" sheets of Confidential Attachment 12 to REP 638, if possible with reference to Confidential Attachment 1 to the Reinvestigation Report. If the ADC did not or was not able to conduct the above-mentioned price comparisons, please provide detailed reasons therefor.

See Explanation for Response to Request 4.b. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

5. Referring to the statement on page 13 of the Preliminary Reinvestigation Report that the ADC considers, "the appropriate course of action is to include the sales that occurred during the inquiry period but for which the purchase orders were placed in the period prior to the inquiry period as part of its price comparability assessment", please clarify the following:

- a. That the Review Panel's understanding in Paragraph 27 of the Reinvestigation Request is correct:

However, my understanding from the C2 Sales spreadsheet and the February 2025 Conference is that those purchase orders falling outside the inquiry period, were in fact part of the relevant export transactions of SSAB AU, as



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reflected in the C2 Sales spreadsheet, that were included in the dumping calculation for the inquiry period. [Footnote Omitted]²

See response to Request 5.a. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

- b. Please clarify if this C-2 Sales spreadsheet referred to in Footnote 1 is the same as the worksheet in Confidential Attachment 1 to the Reinvestigation Report, named “SSAB Aust arms length sales”.

During the conference the Review Panel requested that, as part of the written response, the ADC identify and isolate (in a separate schedule) the additional transactions with purchase order (“PO”) dates in December 2021 or February 2022 but where the invoice date falls outside the Inquiry Period (1 October 2022 – 30 September 2023), which transactions the ADC referred to during the conference, in responding to Item 5b, as being the “extended data” requested from SSAB AU that was relevant to the ADC’s reinvestigation analysis based on PO dates. It was noted that this was in relation to the worksheet in Confidential Attachment 1 to the Reinvestigation Report, named “SSAB Aust arms length sales”.

Following the conference but prior to receiving the written response, the Review Panel advised the ADC that it was unable to visually identify any invoice dates in Column AQ of the worksheet that were outside the Inquiry Period.

See response to Request 5.b. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1. This includes the ADC’s responses to the additional clarifications requested during the conference.

- c. Please clarify what percentage of the C-2 sales listed in Confidential Attachment 28 to the Application for Review was part of the comparison in the reinvestigation using the order date as the appropriate date of comparison, resulting in the

² This C-2 Sales spreadsheet with additional columns indicating purchase order numbers and date of the orders, was attached to the Applicants’ submission to the ADC of 25 July 2024 and described as “SSAB AU C-2 listing – Forward order information.” See also Confidential Attachment 28 to the Application for Review.

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undercutting determination of “between 7% and 9%”. Please also clarify if this is the same percentage as the percentage volume of sales that were not “invalidated” due to material difference in price to the sales invoice, as referenced on page 13 of the Preliminary Reinvestigation Report and clarified in response to Further Information Request 1 above.

See response to Request 5.c. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

- d. Please clarify the percentage of the Bisalloy sales in the worksheet named “Bisalloy PO sales listing” of Confidential Attachment 1 to the Reinvestigation Report, that was part of the comparison in the reinvestigation using the order date as the appropriate date of comparison, resulting in the undercutting determination of “between 7% and 9%”.

See response to Request 5.d. of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

6. The ADC noted on page 14 of the Preliminary Reinvestigation Report, with reference to the finding that SSAB AU undercut Bisalloy by “between 7% and 9%”, that the finding was consistent with the finding of REP 638, though it was noted that “the degree of undercutting using this approach is lower”. Please could the ADC clarify the range of undercutting for the same two largest customers in REP 638, with reference to Confidential Attachment 12 to REP 638.

See response to Request 6 of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.

7. The ADC noted on page 14 of the Preliminary Reinvestigation Report, with reference to the finding that SSAB AU undercut Bisalloy by “between 7% and 9%”, that the finding was consistent with the finding of REP 638, though it was noted that “the degree of undercutting using this approach is lower”. Please could the ADC clarify the range of undercutting for the same two largest customers in REP 638, with reference to Confidential Attachment 12 to REP 638

See response to Request 7 of the written version of the further information that was presented orally at the conference and is attached as Addendum 1.



Further Information Provided After the Conference

- i. Prior to the conference, the ADC was provided with details of the further information sought in order to assist in the preparation of its responses, to be presented orally during the conference, with the final written version of the ADC's responses to the further information sought, to be submitted following the conference.³
- ii. The conference was held open for this purpose and the final written version of the ADC's oral presentation of the responses to the further information sought during the conference was provided to the Review Panel following the conference and is attached as Addendum 1.
- iii. It should be noted that during the conference the ADC was not in a position to respond fully to certain aspects of the further information sought, for the reasons referred to in Footnote 3, and regarding the additional clarifications that were requested during the conference. This information was subsequently provided by the ADC in the final written version of the ADC's responses to the further information sought and is reflected in Addendum 1 and in this conference summary, as if it had been provided during the conference.

³ It should be noted that Requests 4 to 7 of the Further Information Sought by the Review Panel were only provided to the ADC on the day of the conference, just prior to the conference being held.



ADRP 2025/171 – Quenched and Tempered Steel plate from Sweden

ADRP Conference Friday 25 July 2025

Written responses to request for further information – provided on 29 July 2025 (after conference)

ADRP Request 1

1. Please can the ADC clarify the percentage of “invalidated” SSAB AU wear plate purchase orders that were excluded from the comparison due to material difference in price to the sales invoice, as referenced on page 13 of the Preliminary Reinvestigation Report.

Response to Request 1

All wear grade sales are included.

For structural grade, [REDACTED] of sales were excluded.

In aggregate terms, for the total volume of sales of both wear and structural grade, around 3% of sales were excluded (all of which were structural grade), and around 97% were included.

ADRP Request 2

2. Please can the ADC clarify the following statement on page 14 of the Preliminary Reinvestigation Report and indicate how this methodology differed from that of REP 638, as reflected in Confidential Attachment 12 thereto:

*Noting the uniformity of prices across the 4 SSAB AU MCCs, the commission considered it reasonable to compare MCCs at a **higher point of comparison** (using MCC categories of grade, Brinell hardness and thickness) rather than the extended MCC which included width and length.” [emphasis added]*

Response to Request 2

The bracketed description is the basis of comparison (grade, Brinell hardness and thickness).

Additional MCC categories of length and width have been disregarded as they were found to have no impact on SSAB AU pricing. The purpose of the term “higher point of comparison” was meant to refer to the fact that on the data available it was considered reasonable to only compare the three identified MCCs above.

ADRP Request 3

3. Regarding the ADC's statement on page 14 of the Preliminary Reinvestigation Report noting that the price to the distributor is at a different level of trade to the SSAB AU sales but that the ADC considers it is nonetheless reasonable for the purposes of price comparability, could the ADC clarify if this means that the undercutting percentage would likely be higher if adjustments were made for level of trade.

Response to Request 3

The ADC considers that the undercutting percentage would have been higher if an adjustment was made for the level of trade.

The ADC would generally consider that the price offered to a distributor will be lower than the price offered to an end user as a distributor also needs to incorporate a profit margin when on-selling. By selling direct to the end user the manufacturer can capture the distributor margin in part or in full.

The ADC did not have available information about the distributor's profit margin in the reinvestigation to quantify a level of trade adjustment.

ADRP Request 4.a.

4. With reference to the ADC's reinvestigated determination that, "SSAB AU undercut Bisalloy by between 7% and 9%" (on page 14 of the Preliminary Reinvestigation Report) which was calculated for wear plate sales to the two largest common customers:
 - a. Please could the ADC confirm that the percentage undercutting, as reflected in the "Price Undercutting by PO" sheet of Confidential Attachment 1 is calculated with reference to the total value of the sales for the period divided by the total volume of sales for the period, for SSAB AU and Bisalloy, respectively.

Response to Request 4.a.

Yes, it is a weighted average.

ADRP Request 4.b.

- b. Please could the ADC indicate if in the reinvestigation and using the purchase order date as the appropriate date of price comparison:
- i. an aggregate quarterly price comparison was conducted between Bisalloy and SSAB AU's Swedish sourced wear grades, similar to that referenced on page 73 of REP 638, as supported by Confidential Attachment 12.
 - ii. a quarterly price comparison was conducted between Bisalloy and SSAB AU for the 10 common MCC's of wear grades, similar to that referenced on page 71 of REP 638, as supported by Confidential Attachment 12.

If the ADC conducted the above-mentioned price comparisons, please provide details of these calculations and percentages, similar to the "Wear Grade Undercutting" and "Wear – Common MCC" sheets of Confidential Attachment 12 to REP 638, if possible with reference to Confidential Attachment 1 to the Reinvestigation Report. If the ADC did not or was not able to conduct the above-mentioned price comparisons, please provide detailed reasons therefor.

Response to Request 4.b.i.

No. See explanation below.

Response to Request 4.b.ii

No. See explanation below.

Explanation for Response to Request 4.b.

The same analysis as that conducted in REP 638 (quarterly by grade and quarterly for top 10 MCC) was not conducted for the reinvestigation. In REP 638, an aggregate quarterly price comparison was conducted for sales invoiced during the inquiry period. However, in the reinvestigation, because it was evident to the ADC from SSAB AU data that purchase orders extended from August 2021 to September 2023 (that were then invoiced in the inquiry period), the period of data that needed to be examined was much longer. In the reinvestigation, we therefore conducted the analysis using the periods December 2021 and February 2022. The reasons for this are explained in further detail below.

This decision to focus on these specific periods was made based on a range of considerations including:

- the time and resources available to conduct the reinvestigation
- the scale/scope of additional data required from Bisalloy that would be required to undertake the analysis based on purchase order date rather than sales invoice data (further detail on this is included below)
- the basis of the finding in REP 638 that underpinned the ADC recommendation to continue measures, that is that "SSAB AU is prepared to price more aggressively where direct competition exists within the wear grade category".

Scope/scale of data required and time to assess

It was evident to the ADC from SSAB AU data that purchase orders extended from August 2021 to September 2023 and that for a price comparison analysis similar to that conducted for REP 638

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Bisalloy would need to supply a significantly extended data set to match the period covering SSAB AU's purchase orders.

Additional information was requested from SSAB AU and Bisalloy in a "Request for Information" on 10 April 2025 with a due date of 28 April 2025.

Bisalloy sought an extension of time until 12 May 2025 on the basis that Bisalloy needed to engage IT support and expertise to extract the requested data ([REDACTED]) [Explanation for engagement] .

An extension was granted until 5 May 2025, however Bisalloy was able to submit data on 2 May 2025. On review, the data was deficient, and this deficiency was again traced to the difficulty of extracting purchase order data for the period prior to October 2022.

Having in the interim considered SSAB AU's C2 Sales data it was evident that over 90% of SSAB's wear grade sales were to 2 customers ([REDACTED]) and that around 80% of sales to these customers related to purchase orders raised in two months (December 2021 and February 2022).

Given the challenges faced by Bisalloy in providing an extended data set within a timeframe suitable for the reinvestigation, and the approaching deadline for the Preliminary Reinvestigation Report (5 June 2025) the case team decided to narrow the scope of the information request to Bisalloy to capture information relevant for price comparison purposes for the period December 2021 to February 2022 given the high volume of sales during these months.

This data was requested by the ADC on 12 May 2025 and provided by Bisalloy on 16 May 2025 and was sufficiently detailed to allow for the price comparison detailed in the Preliminary Reinvestigation Report published on 5 June 2025.

Note: For context, the ADC notes that SSAB AU also sought multiple extensions of time to provide the additional information requested in the reinvestigation and ultimately provide their complete set of data on 15 May 2025.

Changes necessitated by using purchase order date rather than sales invoice date

The change to considering the data by purchase order date resulted in significantly reduced points of price comparison. Upon review of the sales data provided by SSAB, it was noted that for each purchase order there could be a large number of sales invoices over an extended period of time, which expanded the number of points of sale invoice comparison for that period.

For example, for [REDACTED] there were only [REDACTED] orders, however these [REDACTED] orders resulted in [REDACTED] invoices.

By moving to an analysis by purchase order date, the ADC could more clearly target the date of those [REDACTED] orders whereas the analysis in REP 638 by sales invoice date had to cover [REDACTED] invoices spread across the entire inquiry period. While the ADC generally undertakes a quarterly price undercutting analysis, as was done in REP 638, a monthly analysis where possible is in fact preferable as it provides greater contemporaneity of pricing when considering purchasing decisions.

The ADC considered that moving to an analysis by purchase order date rendered the quarterly analysis undertaken in REP 638 unnecessary.

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Further the ADC was satisfied that the December 2021 and February 2022 purchase orders which accounted for 80% of the total volume of sales to SSAB's key customers ([REDACTED]) represented a meaningful basis of comparison.

Does the finding in REP 638 that "SSAB AU is prepared to price more aggressively where direct competition exists within the wear grade category" still hold true when using purchase order as the basis of comparison?

Given the time and resources available for reinvestigation and the issues detailed in terms of the data available for comparison, the ADC's reinvestigation focussed on the key finding in REP 638 that "SSAB AU is prepared to price more aggressively where direct competition exists within the wear grade category".

The conclusion reached in 638 for using a sales invoice comparison remains the same for when purchase orders are used as the basis of price comparison.

The ADC is satisfied that this conclusion is supported given:

- [REDACTED] accounted for over 90% of SSAB AU's wear grade sales (see cell R56 on tab "SSAB PO Pricing by MCC)
- The volume of these sales is [REDACTED] (see cell R55 on the same tab)
- The value of these sales is [REDACTED]
- Around 80% of sales relating to [REDACTED] derived from purchase orders raised in 2 months, December 2021 and February 2022 (see cell R57 on the same tab)
- Undercutting was evident in relation to these purchase orders
- SSAB AU's prices for the same MCC were [REDACTED] around the same time sales were made [REDACTED].

On the final dot point above, the ADC noted in tab "SSAB PO Pricing by MCC" of Confidential Attachment 1 to the Reinvestigation Report that prices to [REDACTED]

(see cell D85) and [REDACTED]

(see cells F86 and K86).

. The ADC also noted that [REDACTED]

[REDACTED] [details of relative price differences to specific customers]

That the prices paid by these customers [REDACTED] supports the ADC finding that "SSAB AU is prepared to price more aggressively where direct competition exists within the wear grade category".

This finding underpins the ADC's view that in the absence of measures SSAB AU would likely continue to aggressively target common wear grade customers and in so doing undercut Bisalloy's prices leading to the continuation of material injury that the measures are intended to prevent.

ADRP Member Request 5.a.

5. Referring to the statement on page 13 of the Preliminary Reinvestigation Report that the ADC considers, “the appropriate course of action is to include the sales that occurred during the inquiry period but for which the purchase orders were placed in the period prior to the inquiry period as part of its price comparability assessment”, please clarify the following:
 - a. That the Review Panel's understanding in Paragraph 27 of the Reinvestigation Request is correct:

“However, my understanding from the C2 Sales spreadsheet and the February 2025 Conference is that those purchase orders falling outside the inquiry period, were in fact part of the relevant export transactions of SSAB AU, as reflected in the C2 Sales spreadsheet, that were included in the dumping calculation for the inquiry period.”
[Footnote Omitted]¹

Response to Request 5.a.

That is correct.

ADRP Member Request 5.b.

- b. Please clarify if this C-2 Sales spreadsheet referred to in Footnote 1 is the same the worksheet in Confidential Attachment 1 to the Reinvestigation Report, named “SSAB Aust arms length sales”.

Response to Request 5.b.

The worksheet “SSAB Aust arms length sales” in Confidential Attachment 1 is based on the C2 Sales spreadsheet referred to in footnote 1 (Updated C2 Sales listing). The worksheet lists all [REDACTED] transactions listed in the Updated C2 Sales spreadsheet, however it includes additional information requested from SSAB in respect of each transaction for the purpose of the reinvestigation.

The additional information requested was contained at Question 2 of the SSAB request for information sent to SSAB for the purposes of the reinvestigation (see column H to column S of worksheet). For convenience, this request is extracted below:

¹ This C-2 Sales spreadsheet with additional columns indicating purchase order numbers and date of the orders, was attached to the Applicants submission to the ADC of 25 July 2025, describes as “a.SSAB AU C-2 listing – Forward order information.” See also Confidential Attachment 28 to the Application for Review.

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2. Please complete the attached spreadsheet which is based on your C2 – Sales spreadsheet that was utilised for the calculation of the deductive export price. For tab (a) we have added the following additional columns for all transactions for you to complete:
- Customer purchase order number – if the order has been amended indicate the PO sequence ie PO12345/1 relevant to the line item. We have pre-populated this column based on data from your post-SEF submission. Please complete for all lines and include details on PO amendments, you may have to overwrite the pre-populated data.
 - Purchase order date – if the order has been amended enter the amendment date relevant to the line item. We have pre-populated also this column based on data from your post-SEF submission. Please complete for all lines and include details on PO amendments, you may have to overwrite the pre-populated data.
 - Unit price (per tonne) as per purchase order
 - Estimated delivery date as per purchase order
 - Actual date of arrival of the order to Australia
 - Date of delivery to the Australian customer
 - Whether the goods were deliver directly from the port to the customer (yes/no)
 - If no for how long were the goods stored before despatch to the customer, expressed in number of days?
 - Quantity expressed in pieces (number of plates)
 - Date the invoice was paid by the customer

In addition, the commission requested that SSAB add additional lines of data as necessary for any purchase orders raised during the inquiry period where the sales invoice was issued outside the inquiry period. For convenience, this is extracted below:

7.→Please add lines to the attached C2 Sales listing tab (a) for all purchase orders raised during the inquiry period (up until 30 September 2023) for goods to be manufactured in Sweden that had not been invoiced as sales by 30 September 2023.¶

Complete as many of the C2 Sales columns (including the additional columns requested in question 2 above) as possible, noting the possibility that some of those purchase orders may not have been invoiced as yet.¶

Mark each of these new lines as a “yes” in column “New line?”¶

On reviewing this data following the conference with the ADRP on 25 July 2025, the ADC confirms that no new lines of data were added by SSAB in relation to this question (see column A of worksheet).

During the conference the Panel Member requested that, as part of the written response, the ADC identify and isolate (in a separate schedule) the additional transactions with purchase order (“PO”) dates in December 2021 or February 2022 but where the invoice date falls outside the Inquiry Period (1 October 2022 – 30 September 2023). In responding to Item 5b during the conference, the ADC referred to these transactions as being the “extended data” requested from SSAB AU that was relevant to the ADC’s reinvestigation analysis based on PO dates. This was in relation to the worksheet (in Confidential Attachment 1 to the Reinvestigation Report, named ‘SSAB Aust arms length sales’).

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Following the conference the Panel Member was unable to visually identify any invoice dates in Column AQ of the worksheet that were outside the Inquiry Period.

Following the conference, the commission confirmed (from an examination of column AQ) that there were no transactions where the invoice date fell outside the inquiry period. As discussed above, no new lines of data were added by SSAB (see column A of worksheet).

ADRP Member Request 5.c.

- c. Please clarify what percentage of the C-2 sales listed in Confidential Attachment 28 to the Application for Review was part of the comparison in the reinvestigation using the order date as the appropriate date of comparison, resulting in the undercutting determination of “between 7% and 9%”. Please also clarify if this is the same percentage as the percentage volume of sales that were not “invalidated” due to material difference in price to the sales invoice, as referenced on page 13 of the Preliminary Reinvestigation Report and clarified in response to Further Information Request 1 above.

Response to Request 5.c.

All or 100% of the sales (ie. all [REDACTED] transactions) listed in the Updated C-2 sales listing were used for the purposes of the reinvestigation.

As noted at Question 1, 100% of wear grade sales (ie. all [REDACTED] transactions) were used for the purposes of the price comparison conducted.

[REDACTED] of structural sales were “invalidated” due to material difference in price to the sales invoice. As the ADC was only requested to reinvestigate findings relating to wear grade products the exclusion of these structural grade sales has no bearing on the ADC price undercutting findings.

ADRP Member Request 5.d.

- d. Please clarify the percentage of the Bisalloy sales in the worksheet named “Bisalloy PO sales listing” of Confidential Attachment 1 to the Reinvestigation Report, that was part of the comparison in the reinvestigation using the order date as the appropriate date of comparison, resulting in the undercutting determination of “between 7% and 9%”.

Response to Request 5.d.

All sales listed in the “Bisalloy PO Sales” listing (ie. all [REDACTED] transactions) were used for the purposes of conducting the price comparison. That is, all the data was considered for the purposes of the price comparison however the nature of a price comparison is such that only the most relevant information for price comparison purposes is used. This will necessarily involve the exercise of judgement.

For example, the volume of sales contained on the “Bisalloy PO Sales” is [REDACTED]. Some of this volume relates to MCC that are not relevant for price comparison purposes, or were sold to destinations that were not considered appropriate for comparison purposes (noting the focus of the analysis was on [REDACTED] located [REDACTED]).

As such, while all of the Bisalloy data was used for the purposes of the analysis, filters were used to refine the analysis. In this instance Bisalloy’s sales transactions were filtered by “MCC” and “State”

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to refine the analysis to sales of certain wear grade models to ensure the greatest degree of price comparability with SSAB AU sales.

ADRP Request 6

6. The ADC noted on page 14 of the preliminary Reinvestigation Report, with reference to the finding that SSAB AU undercut Bisalloy by “between 7% and 9%”, that the finding was consistent with the finding of REP 638, though it was noted that “the degree of undercutting using this approach is lower”. Please could the ADC clarify the range of undercutting for the same two largest customers in REP 638, with reference to Confidential Attachment 12 to REP 638

Response to Request 6

For the reasons detailed in Question 4 the analysis undertaken for the reinvestigation is more targeted than that conducted in REP 638.

Because the approach to analysis was more targeted the conclusion in the Preliminary Reinvestigation report that “the degree of undercutting using this approach is lower” is an inference drawn from worksheets “Wear MCC 1” and “Wear MCC 2” in Confidential Attachment 12 to REP 638.

On worksheet “Wear MCC 1” the range of undercutting was between 17% and 19%.

On worksheet “Wear MCC 2” the range of undercutting was between 8% and 17%.

ADRP Request 7

7. Please could the ADC provide the average lead times from order date to delivery date for SSAB AU and Bisalloy respectively.

Response to Request 7

Average lead time for SSAB order date to sales invoice date (noting sales invoices are issued at or close to the time of delivery) is [REDACTED].

This information is not available for Bisalloy from the data provided by Bisalloy.